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December 12, 2022

BY ECF FILING

Hon. Jesse M. Furman Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007

Re: Bematech Holdings LLC v. TOTVS Large Enterprise Tecnologia S.A., et al., No. 22 Civ. 7873 (JMF)

Dear Judge Furman:

This firm represents plaintiff Bematech Holdings LLC in the above-referenced action. We write to request an adjournment of the initial pretrial conference, currently scheduled for December 20, 2022 at 9:00 a.m. *See* ECF No. 8.

We seek to adjourn that conference until approximately 30 days after the time defendants are to respond to the complaint. That response is due January 18, 2023, as a result of defendants' waiver of service. *See* ECF Nos. 9, 10. The requested adjournment will allow the parties time to consider the scope of anticipated discovery and an appropriate schedule.

On December 7, we asked counsel for the defendants for their consent. They have not responded.¹

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Christopher Shields

Application GRANTED. The initial pretrial conference, currently scheduled for December 20, 2022, is hereby adjourned to **February 14**, **2023 at 9:00 a.m.** The Clerk of Court is directed to terminate ECF No. 11. SO ORDERED.

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cc (by email): Christina H. Bost Seaton, Esq.

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¹ Christina Bost Seaton, Esq., of FisherBroyles LLP executed and returned waivers of service on behalf of defendants, but has not filed a formal notice of appearance.